

ATTACHMENT 3
COMMENT LETTERS AND RESPONSES

The BLM released the Final Environmental Assessment on June 7, 2004. Three comment letters were received in response to BLM's request for public input. Below are the comments received (noted in *italic font*) and BLM's response (regular font).

Amy Boyle, Wyoming Department of Environmental Quality, Land Quality Division

On page 93, it states the Ft Union is approximately 1,500 feet thick in the area of TMRT. Review of Lance well BCX-56-LA is total depth of 1,060 feet. The analysis should be clarified.

On page 201, Table 5.1 my name was misspelled.

Thank you for your comment. The approximate full thickness of the Fort Union Formation is 1,500 feet but due to the dip of the beds to the northeast and subsequent erosion, the thickness varies markedly across the outcrop. Since the EA only identified an approximate thickness, no modification is needed.

We have modified the environmental assessment to correct the spelling of your last name. See Attachment 4, Errata.

B. Sachau

I am requesting a copy of the EA be sent to me.

BLM provided a copy of the Final EA.

I oppose and object to the destruction of 7,054 acres. This is anti-environmental. [Three] 3 acres and then go underground would be ok. Also how will this coal lease be handled after empty - is there an up front bond fund that this lessee has to provide to guarantee that the mine will be filled in and we won't have cave in land that remains after finished. The American public has enough mined land that is subject to cave ins and we don't want any more land left like that.

The TMRT encompasses 5,915.73 mineral acres of which 2,242.18 mineral acres are owned by the public (pg 17). Most surface facilities (with the exception of a powerline) and the portal into the underground mine would be within the existing mine permit area where disturbance has already taken place (pg 18, 19). Any subsequent subsidence would be reclaimed as necessary (pg 37).

No lease should be given without an insurance guaranteed fund set up to guarantee fill; in after drilling and use. No holes in the ground should be left.

A reclamation performance bond is required to assure adequate reclamation takes place including any areas of repaired subsidence (pg 38).

Air quality will be impaired. Too much water will be used. Dust particulates do not just impact vicinity at all - they travel across the country and even end up in Europe and Africa.

Analysis shows that ambient air quality standards or Class II PSD increments are not expected to be exceeded as the result of the Proposed Action. The lessee/operator would be required to comply with NAAQS, WAAQS, and Class II PSD increments for all regulated emissions (pg 119).

Does anyone at BLM know what a horror land caving in is? A zoo recently had a giraffe and another animal drown in soil in a cave in. 6-9 ft subsidence is completely unacceptable. I do not think letting a lessee be responsible for subsidence damage for 5 years is at all acceptable. I think the lessee must get a bond up front that goes for 100 years to guarantee against damage from subsidence. Somehow the coal that is taken out must be replaced so that the land is stable.

As stated in the analysis, mining of coal will result in a slight lowering of the elevation in the TRMT area of 6 to 9 feet, with the exception of the main and submain entries. However, since the surface is naturally undulating, it is unlikely that there would be any identifiable surface expression of the subsidence (i.e., cave in or sink hole) due to the depth of the coal mined. Once a longwall panel has been mined, the surface would gradually settle over an approximately 2-year period. Surface cracks, should they occur during settling of the surface, would be assessed and reclaimed if needed (pg 127).

This is a terribly scarring mark on environment.

Most surface disturbance would be located within the existing mine permit area where the surface has already been disturbed. In addition, an area of unknown size but assumed to be no more than 59 acres could potentially be disturbed as a result of subsidence or the reclamation thereof.

All hunting and trapping should be banned in this area. Grazing should also be banned, as well as use by two stroke engines. There is no question that this lease will result in the killing of ferrets. The impact on wildlife and birds will be substantial and negative and I find that a good reason to deny this lease. Wild horses will fall into the subsidence or break a leg and die.

The purpose of the analysis was to assess the potential impacts of leasing the federal mineral estate in order to assure enough coal production to meet the needs of the nearby power plant. The BLM has determined no animals including listed species will be adversely affected by the proposal.

Negatively affecting the aquifer is very, very bad for people living in the area. I note a reference on page 122 to the Army Corps of Engineers. I hope you are aware that the Army Corps of Engineers has acted very irresponsibly toward the environment time after time. This agency seems to think it works only for business, so their advice should be taken with a consciousness of this fact.

The nearest residences are located approximately 8 miles west of the TRMT. Page 122 provides no reference to the Corps of Engineers.

I think the contract needs to be looked at far more closely since it seems to do a terrible job of protecting resources that belong to all Americans. It must have been written 50 years ago. I am sure attention to this document will result in a more protective document.

Profiteers always claim there will be no effect on the environment but when greed and money enter the picture, it certainly does effect the environment.

Thank you for your comment.

Bill Wichers, Wyoming Game and Fish Department

The staff at the Wyoming Game and Fish Department has reviewed the Final Environmental Assessment for the Proposed Ten Mile Rim Lease-by-Application and Associated Rights-of-Way within the Rock Springs Field Office area. We provided terrestrial wildlife and aquatic comments on the Draft [document], dated March 3, 2003. We have no additional concerns.

Thank you for your comment.